

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

G&A STRATEGIC INVESTMENTS I LLC,  
*et al.*,

Plaintiffs,

Case No. 1:23-cv-10766-JSR

v.

PETRÓLEOS DE VENEZUELA, S.A., *et al.*,

Defendants.

GIRARD STREET INVESTMENT  
HOLDINGS LLC,

Plaintiff,

Case No. 1:23-cv-10772-JSR

v.

PETRÓLEOS DE VENEZUELA, S.A., *et al.*,

Defendants.

GIRARD STREET INVESTMENT  
HOLDINGS LLC,

Plaintiff,

Case No. 1:24-cv-04448-JSR

v.

PDV HOLDING, INC.,

Defendant.

**PETRÓLEOS DE VENEZUELA S.A.’S AND PDVSA PETRÓLEO, S.A.’S NOTICE OF  
MOTIONS FOR SUMMARY JUDGMENT**

**PLEASE TAKE NOTICE** that pursuant to Rule 56 of the Federal Rules of Civil Procedure, Defendants Petróleos de Venezuela, S.A. (“PDVSA”) and PDVSA Petróleo, S.A. (“PDVSA Petróleo”) (collectively, “Defendants”) intend to move this court for an order granting summary

judgment against Plaintiffs for all or portions of the relief sought in the Amended Complaint in *G&A Strategic Investments I LLC et al. v. Petróleos de Venezuela, S.A. et al.*, No. 1:23-cv-10766-JSR, and in the Consolidated Amended Complaint in *Girard Street Investment Holdings LLC v. Petróleos de Venezuela, S.A. et al.*, No. 1:23-cv-10772- JSR and *Girard Street Investments Holdings LLC v. PDV Holding, Inc.*, No. 1:24-cv-4448-JSR. In accordance with the schedule approved by the Court on February 27, 2025, Defendants' moving papers are due on March 19, 2025, Plaintiffs' answering papers are due on April 2, 2025, Defendants' reply papers are due on April 9, 2025, and oral argument is set for April 23, 2025 at 2:00 p.m. ET at 500 Pearl Street, New York, New York.

[Signature block on the following page.]

Dated: March 3, 2025

Respectfully submitted,

VINSON & ELKINS LLP

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**ATTORNEYS FOR DEFENDANTS,  
PETRÓLEOS DE VENEZUELA, S.A. AND  
PDVSA PETRÓLEO, S.A.**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 3rd day of March, 2025, a true and correct copy of the foregoing PETRÓLEOS DE VENEZUELA S.A.'S AND PDVSA PETRÓLEO, S.A.'S NOTICE OF MOTIONS FOR SUMMARY JUDGMENT was served by via ECF on all counsel of record.

*/s/ Camilo Cardozo*  
Camilo Cardozo